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February 11, 2025

***Via ECF FILING***

Honorable Jerrold N. Poslusny, Jr.  
Mitchell H. Cohen U.S. Courthouse  
400 Cooper Street, 4th Floor  
Camden, N.J. 08101  
Courtroom 4C

***Re: In re Daryl Fred Heller – Case No. 25-11354***

Dear Judge Poslusny:

Please be advised that my office represents Deerfield Capital, LLC. Attached please find a courtesy copy of a Motion for Relief, Prohibit Use of Cash Collateral, Transfer Venue and Expedited Discovery. The Movant is also filing an Application for Expedited Hearing and Shortened Notice. We would ask for a conference with the Court to discuss scheduling a hearing and a brief discovery period (2 weeks). The Movant has two motions for the appointment of receiver pending for entities in which Daryl Heller has an interest and existing injunctions against Debtor and his family members and entities for which, other than the Debtor, remain in place. Given the allegations in the motion, the injunction orders in both PA and NY which raise serious concerns and the appointment of a receiver over entities in which the Debtor has an interest in Michigan and Massachusetts, early intervention by the Court is warranted.

Sincerely,

***/s/ Albert A. Ciardi, III***

Albert A. Ciardi, III

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